

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

**BARRY STAUBUS, in his official capacity as
the District Attorney General for
the Second Judicial District, TN;
TONY CLARK, in his official capacity as
the District Attorney General for the
First Judicial District, TN;
DAN ARMSTRONG, in his official capacity as
the District Attorney General for the
Third Judicial District, TN; and BABY DOE,
by and through his Guardian Ad Litem,**

Plaintiffs,

v.

**PURDUE PHARMA, L.P.:
PURDUE PHARMA, INC.:
THE PURDUE FREDERICK COMPANY:
MALLINCKRODT PLC;
ENDO HEALTH SOLUTIONS, INC;
ENDO PHARMACEUTICALS, INC;
CENTER POINTE MEDICAL CLINIC, LLC;
ELIZABETH ANN BOWERS CAMPBELL;
PAMELA MOORE; and
ABDELRAHMAN HASSABU MOHAMED,**

Defendants.

Case No. 2:17-CV-00122

Judge Thomas A. Varlan

PLAINTIFFS' MOTION TO REMAND

Plaintiffs District Attorney Barry Staubus, District Attorney Tony Clark, District Attorney Dan Armstrong, and Baby Doe ("Plaintiffs"), by and through their counsel, pursuant to 28 U.S.C. § 1447(c), hereby move the Court for entry of an order remanding this matter to the Circuit Court for Sullivan County, Tennessee, and for an award of Plaintiffs' costs and attorneys'

fees associated with the removal of this case to this Court. As grounds for this motion, Plaintiffs aver that their complaint relies solely upon state law, and that there is not complete diversity between the parties. As such, this Court is without subject matter jurisdiction to hear the case. In support of this motion, Plaintiffs rely upon their memorandum of points and authorities, filed concurrently herewith, as well as the entire record in this cause.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2017, a copy of this pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system. All other parties will be served by regular U.S. mail as follows:

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